COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. No. 99-271

Comments of WorldCom, Inc. Regarding KPMG's Exception No. 9

KPMG Exception No. 9:	Bell Atlantic has used a formula and data and excluded certain data from the calculation metric creating misleading performance results inconsistent with the February 28, 2000 Carrier-to-Carrier Guidelines
Domain:	Performance Metric Reporting
KPMG Assessment:	If the Bell Atlantic's metric creation practice does not comply with the February 28, 2000 New York Carrier-to-Carrier Guidelines the reported performance does not reflect the actual operation being measured.
Date of Exception:	May 9, 2000
Date of BA Response:	May 17, 2000
Date of MCI WorldCom Comments:	June 5, 2000

MCI WorldCom Comments:

Issue 9.1

PO-3-02: WorldCom is dismayed that BA is reporting incorrectly metrics that are well established in New York. Because 15% of abandoned calls and 10% of busy calls are not included in the denominator, this error artificially increases the percentage of calls answered in 20 seconds. This is a serious omission in BA's favor. BA should be required to recalculate all past reports under the correct business rules (using, if necessary, the current numbers as a surrogate for the abandoned and busy calls to be added to past denominators). BA also must promptly capture busy calls. The ignored rule gave BA the benefit of the doubt to begin with in assuming that only 15% of calls abandoned or 10% of busy responses were cases where the CLEC gave up because of a long wait in the queue or an inability to get through after several tries.

Issue 9.2

PO-2: WorldCom understood that both EnView-captured and CLEC-reported outages would be used to determine OSS Availability. KPMG's review of BA's 5/15/00 supply of the EnView logs

hopefully will show this is true. If not, outages may have been under reported because CLECs did not persist in self-reporting on the belief that these outages were being captured through EnView transactions.

Issue 9.3

BA's answer is confusing to WorldCom. WorldCom, like all CLECs, expects answer times to be measured for all calls to Contact Centers for ordering, provisioning, maintenance and billing issues. WorldCom assumed that the exclusion of calls to account representatives did not exclude whole centers from this measurement. If BA's 800 number or press-0 options do not direct calls into the Order Entry Help Desk, Billing and Collections Center or Systems Administration Center, then the metric must be revised to close this loophole. It is critical that CLECs receive a quick response from all help desk centers.

WorldCom is also confused at how BA could include the designated percentage of busy and abandoned calls with this metric for Speed of Answer (per the note in BA's response) but not for the calculation described in Issue 9.1, above. It is the same metric.

Issue 9.4:

As WorldCom understands it, this metric's intent it is to look at trouble reports in the current month and report them for all installations that were no further in the past than the 7 or 30 day period described. The troubles should be reported in the month they occur, but the order may have been installed in the prior month with the seven or 30 day period overlapping the current month. If BA's modification will make this fact clear, WorldCom is not opposed to it. However, BA's description of the denominator does not seem to capture the intent to include all installations that had some or all of the seven or 30 day installation quality monitoring periods in effect during the month. Although not entirely clear, BA's clarification proposal appears to capture only lines installed or lines worked for troubles in the current month. Neither population of the denominator is appropriate. It should be all the new installs that have monitoring periods active in the current month. This should not delay the reporting. The point of this metric is to see what percentage of CLEC new installs versus BA new installs have troubles during the monitoring period and this would require capturing installs from the prior month in some cases.